

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,) CRIM. NO. 05-30020-MAP
)
 vs.)
)
 EDDIE SANTIAGO,)
)
 Defendant.)

GOVERNMENT'S MOTION FOR VOIR DIRE QUESTIONS

Now comes Michael J. Sullivan, United States Attorney for the District of Massachusetts, by and through William M. Welch II, Assistant United States Attorney, and hereby files the following request for voir dire questions:

1. Have you, your relatives, or close friends ever been charged with a criminal offense? (If any potential juror answers this question in the affirmative, the Government respectfully requests that the Court ask at the bench the following questions of the potential juror regarding the circumstances so as to avoid embarrassment to the potential juror):

- a. What was the nature of the offense?
- b. Were you convicted?
- c. Would this prevent you from reaching a verdict based solely on the evidence in this case?

2. Have you, your relatives, or close friends ever been investigated for any criminal offense? If so,

- a. How long ago?

- b. Were you treated fairly and courteously?
- c. Was there anything about this experience that would prejudice you either for or against the Government?

3. Have you any sympathy, convictions, beliefs, matters of conscience, or affiliations with any organizations or associations which would make it difficult or impossible for you to sit as a juror in this case?

4. Do any of you believe in the legalization of any controlled substances?

5. Do any of you feel that the drug laws of the United States are too harsh or too lenient? Do you feel that the drug laws are applied unfairly in any way?

6. Some of the witnesses for the Government in this case may be law enforcement officers. Do any of you have any feelings which may make you favor or disfavor the testimony of such individuals?

7. Some of the witnesses for the Government are individuals who have agreed to plead guilty to a drug crime and cooperate with the Government by testifying if necessary in exchange for leniency at sentencing. Do any of you have any feelings that may make you favor or disfavor the testimony of such individuals? Do any of you have any feelings about the Government entering into cooperation agreements with individuals in exchange for leniency at sentencing?

8. This case involves an undercover or controlled purchase of narcotics. Do any of you feel or believe that law enforcement selects or targets minorities for these types of investigations more than others? If so, do any of you have any positive or negative feelings about that fact?

Dated this 14th day of July, 2006.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

/s/ William M. Welch II
WILLIAM M. WELCH II
Assistant United States Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
July 14, 2006

I, William M. Welch II, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing by electronically serving said motion upon Vincent Bongiorno, Esq.

/s/ William M. Welch II
WILLIAM M. WELCH II
Assistant United States Attorney